

Attachment 2 to Bledsoe Declaration

ATTACHMENT NO. 2**TEXAS STATE CONFERENCE OF NAACP BRANCHES v. TEXAS
TIME RECORDS FOR GARY L. BLEDSOE**

Date	Matter	Description	User/Quantity	Rate
09/13/2013	00036-Texas NAACP (Voter ID)	Reviewed the proposed Amended Complaint	Gary Bledsoe 1.5	\$613.00
09/24/2013	00036-Texas NAACP (Voter ID)	Reviewed correspondence from DOJ to Texas AG's	Gary Bledsoe 0.25	\$613.00
09/26/2013	00036-Texas NAACP (Voter ID)	Reviewed Consolidation Order	Gary Bledsoe 0.1	\$613.00
11/22/2013	00036-Texas NAACP (Voter ID)	Responded to email regarding activity in case 2:13-cv-00193 describing which attorneys are on our side in the redistricting case	Gary Bledsoe 0.1	\$613.00
12/07/2013	00036-Texas NAACP (Voter ID)	Reviewed proposed interrogatories and constructed interrogatory suggestions	Gary Bledsoe 0.75	\$613.00
01/02/2014	00036-Texas NAACP (Voter ID)	Reviewed discovery requests to client	Gary Bledsoe 1.5	\$613.00
01/22/2014	00036-Texas NAACP (Voter ID)	ACTIVITIES: Appear for/attend: Conference with co-counsel, re: discovery and other matters	Gary Bledsoe 1.20	\$613.00
02/11/2014	00036-Texas NAACP	Reviewed and discussed documents for potential document production	Gary Bledsoe 1.5	\$613.00

	(Voter ID)			
04/10/2014	00036-Texas NAACP (Voter ID)	Prepared outline for co-counsel regarding additional harms to the community from Voter ID Law	Gary Bledsoe 0.25	\$613.00
04/29/2014	00036-Texas NAACP (Voter ID)	ACTIVITIES: Appear for/attend: Conference Call on NAACP Responses to RFPs	Gary Bledsoe 1.30	\$613.00
05/28/2014	00036-Texas NAACP (Voter ID)	Telephone Call with victim/witness Sammi Bates	Gary Bledsoe 0.25	\$613.00
06/02/2014	00036-Texas NAACP (Voter ID)	Prepared 30(b)(6) witness (Y. Banks)	Gary Bledsoe 1.5	\$613.00
06/03/2014	00036-Texas NAACP (Voter ID)	Worked on 30(b)(6) responses (Y. Banks)	Gary Bledsoe 1.5	\$613.00
06/04/2014	00036-Texas NAACP (Voter ID)	Reviewed subpoena requests on Legislators from the State	Gary Bledsoe 0.5	\$613.00
06/07/2014	00036-Texas NAACP (Voter ID)	Reviewed documents provided by Terri Dukes, possible victim of related DL's registration law	Gary Bledsoe 0.25	\$613.00
06/24/2014	00036-Texas NAACP (Voter ID)	Review and Send email Communications to co-counsel regarding Texas Motion to Stay Fees	Gary Bledsoe 0.80	\$613.00
06/25/2014	00036-Texas NAACP (Voter ID)	Reviewed data from candidate Pierre involving Houston case with issues regarding provisional ballots	Gary Bledsoe 1.25	\$613.00
07/30/2014	00036-	Prepared witnesses (S. Bates	Gary Bledsoe	\$613.00

	Texas NAACP (Voter ID)	and C. Jackson) for deposition	2.0	
07/31/2014	00036-Texas NAACP (Voter ID)	Defended S. Bates and C. Jackson depositions	Gary Bledsoe 3.0	\$613.00
08/01/2014	00036-Texas NAACP (Voter ID)	Traveled to Hearne, TX to interview and prepare witness E. Davis	Gary Bledsoe 8.0	\$613.00
08/27/2014	00036-Texas NAACP (Voter ID)	Reviewed reports of Houston intimidation	Gary Bledsoe 0.5	\$613.00
08/28/2014	00036-Texas NAACP (Voter ID)	Weekly ALL non-DOJ Plaintiff Texas Section 2 Call 866-214-4423; 5161200#	Gary Bledsoe 1.0	\$613.00
08/28/2014	00036-Texas NAACP (Voter ID)	Weekly Texas Section 2 Call w/ DOJ 866-214-4423; 5161200#	Gary Bledsoe 1.0	\$613.00
09/02/2014	00036-Texas NAACP (Voter ID)	Bench Trial @ 9:00am 3rd floor Rm 310 Attended trial, assisted with depo prep and preparation for cross-examinations	Gary Bledsoe All Day (09/02/2014) 4.0	\$613.00
09/03/2014	00036-Texas NAACP (Voter ID)	Bench Trial @ 9:00am 3rd floor Rm 310 Attended trial, assisted with depo prep and preparation for cross-examinations	Gary Bledsoe All Day (09/03/2014) 8.0	\$613.00
09/04/2014	00036-Texas NAACP (Voter ID)	Bench Trial @ 9:00am 3rd floor Rm 310 Attended trial, assisted with depo prep and preparation for	Gary Bledsoe All Day (09/04/2014)	\$613.00

		cross-examinations	8.0	
09/02-09/04/2014	00036-Texas NAACP (Voter ID)	TRAVEL EXPENSE: 217 miles @ \$0.50/mile (one-way) or 434 miles @\$0.50 (round-trip)	Gary Bledsoe --	\$217.00
10/12/2014	00036-Texas NAACP (Voter ID)	Drafted affidavit for election official	Gary Bledsoe 0.25	\$613.00
10/24/2014	00036-Texas NAACP (Voter ID)	Confer with Co-counsel and review joint response	Gary Bledsoe 0.5	\$613.00
10/26/2014	00036-Texas NAACP (Voter ID)	Interviewed witnesses in Robertson County	Gary Bledsoe 0.5	\$613.00
08/15/2015	00036-Texas NAACP (Voter ID)	News Release (No Charge/0.25)	Gary Bledsoe (0.25)	\$613.00
02/24/2016	00036-Texas NAACP (Voter ID)	Conference call and meeting with staff to prepare for conference call in Veasey v. Abbott voter ID case.	Gary Bledsoe 1.25	\$613.00
04/26/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding contacting other NAACP units on filing Brief-En Banc and wrote about intimidation and counting issue	Gary Bledsoe 0.1	\$613.00
04/30/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding Harris County voter fraud amici brief.	Gary Bledsoe 0.1	\$613.00
05/02/2016	00036-	Responded to email from	Gary Bledsoe	\$613.00

	Texas NAACP (Voter ID)	Armand Derfner regarding book excerpts about voter mistakes and fraud in absentee and mail-in ballots.	0.1	
05/05/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding Veasey v. Abbott En Banc Oral Argument	Gary Bledsoe 0.1	\$613.00
05/13/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email to Janai Nelson regarding intent issue in voting rights litigation as well as the handling of legislative evidence	Gary Bledsoe 0.1	\$613.00
05/24/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding oral argument to the United States Court of Appeals for the Fifth Circuit	Gary Bledsoe 0.1	\$613.00
07/22/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email discussing previous Texas voter form that was an affidavit form where signers indicated they left or lost their voter registration. Also discussed 2009 proposed compromise to allow voters to use 2 types of photo documentation, which did not pass ultimately.	Gary Bledsoe 0.1	\$613.00
07/23/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding next steps in Texas Photo ID as well as informing the group that it is best to avoid using the term perjury or any clear threat, as such language is intimidating and oppressive and will discourage people from voting.	Gary Bledsoe 0.3	\$613.00
07/24/2016	00036-Texas	Sent an email about Texas Photo ID with 6 attachments	Gary Bledsoe	\$613.00

	NAACP (Voter ID)	each one being a different Texas form- (ex. Oath of office, DL form, Houston public housing application) to examine class distinctions in terms of severity of the threat or warning associated with a signature for various benefits or privileges.	0.1	
07/28/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email news story regarding voter fraud in the Republican Primary, and if there is a basis for the DOJ to consider looking into the matter.	Gary Bledsoe 0.1	\$613.00
07/28/2016	00036-Texas NAACP (Voter ID)	Responded to email regarding South Carolina's misleading voter instructions	Gary Bledsoe 0.1	\$613.00
08/02/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding the proposed language to the State for a new paragraph. Suggested additional language to be used in the paragraph.	Gary Bledsoe 0.2	\$613.00
08/03/2016	00036-Texas NAACP (Voter ID)	Send email containing link to news story about Texas reaching a deal on weaker voter ID rules for November	Gary Bledsoe 0.1	\$613.00
08/04/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding what to be contained in the revised brief.	Gary Bledsoe 0.1	\$613.00
08/10/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding DOJ concern re: special master issue	Gary Bledsoe 0.1	\$613.00
08/10/2016	00036-Texas NAACP	Call with (712) 775-7031	Gary Bledsoe 0.3	\$613.00

	(Voter ID)			
08/11/2016	00036-Texas NAACP (Voter ID)	Reviewed and Sent email detailing some of your thoughts about AEO data that was received.	Gary Bledsoe 0.3	\$613.00
08/11/2016	00036-Texas NAACP (Voter ID)	Conducted website report review	0.5	\$613.00
08/11/2016	00036-Texas NAACP (Voter ID)	Call with (712) 775-7031	Gary Bledsoe 0.1	\$613.00
08/16/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding news story about Texas planning to appeal strict voter ID case to the U.S. Supreme Court	Gary Bledsoe 0.1	\$613.00
08/16/2016	00036-Texas NAACP (Voter ID)	Call with (712) 775-7031	Gary Bledsoe 0.8	\$613.00
08/18/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding AG Paxton going on fox news and threatening prosecution for affidavits	Gary Bledsoe 0.1	\$613.00
08/25/2016	00036-Texas NAACP (Voter ID)	Drafted 3 affidavits	Gary Bledsoe 2.5	\$613.00
08/26/2016	00036-Texas NAACP (Voter ID)	Reviewed affidavits	Gary Bledsoe 0.5	\$613.00
08/26/2016	00036-Texas NAACP	Email with All Texas Voter ID regarding Harris County Clerk Will Vet Voters Who Claim to	Gary Bledsoe 0.1	\$613.00

	(Voter ID)	Lack Photo ID		
08/26/2016	00036-Texas NAACP (Voter ID)	Drafted affidavit for Dr. Richard Watkins	1.25	\$613.00
08/28/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding proposed outline for discussion for call this morning.	Gary Bledsoe 0.1	\$613.00
09/02/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding Veasey v. Abbott: Letter from Private Plaintiffs. Discussed how the State will not implement the remedy in good faith and that the State is now backing away from what Stanart said	Gary Bledsoe 0.1	\$613.00
09/02/2016	00036-Texas NAACP (Voter ID)	Reviewed statements in the media by elected and appointed officials that we believe my threaten or constitute voting intimidation	1.25	\$613.00
09/07/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email proposing to add the Douglas Declaration as an exhibit.	Gary Bledsoe 0.1	\$613.00
09/07/2016	00036-Texas NAACP (Voter ID)	Conversed with lawyers and witnesses regarding statements; drafted 2 affidavits (Oliver Hill and James Douglas)	3.9	\$613.00
09/16/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding DOJ request for consent to file reply	Gary Bledsoe 0.1	\$613.00
09/19/2016	00036-Texas NAACP (Voter ID)	Veasey v. Abbott: Telephonic hearing Call with (712) 775-7031	Gary Bledsoe 1.3	\$613.00

09/19/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to revised proposed order for motion for additional relief. Added suggestions for how to make the document better.	Gary Bledsoe 0.1	\$613.00
09/19/2016	00036-Texas NAACP (Voter ID)	Call with (712) 775-7031	Gary Bledsoe 0.4	\$613.00
09/23/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email containing link to Texas Secretary of State Voter Identification Procedures Election Advisory. SOS requires a scan of all signed declarations.	Gary Bledsoe 0.1	\$613.00
09/23/2016	00036-Texas NAACP (Voter ID)	Responded to email regarding Texas Election ID Cards which contained language to the effect that voters must still use SB 14 ID.	Gary Bledsoe 0.1	\$613.00
10/25/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding reports of voter complaints from Bexar County, Ector County, and Bell County. Recommended sending out a press advisory about issues so the remainder of the State can be aware	Gary Bledsoe 0.1	\$613.00
10/28/2016	00036-Texas NAACP (Voter ID)	Sent email regarding Reasonable Impediment Affidavits being sent to Austin and being made available to others, and the history of vigilante groups seeking to intimidate honest citizens. Also discussed the privacy issues related to releasing this information.	Gary Bledsoe 0.3	\$613.00

11/02/2016	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding Harris County early voters being given incomplete ID instructions including the election judge warning voters that they are signing under penalty of perjury	Gary Bledsoe 0.1	\$613.00
01/20/2017	00036-Texas NAACP (Voter ID)	Reviewed and responded to email re: Veasey v. Abbott: Motion for a Continuance	Gary Bledsoe 0.1	\$613.00
01/21/2017	00036-Texas NAACP (Voter ID)	Reviewed and responded to email regarding the DOJ employees being in a difficult situation	Gary Bledsoe 0.1	\$613.00
01/21/2017	00036-Texas NAACP (Voter ID)	Responded to email regarding TRO on common interest privilege	Gary Bledsoe 0.1	\$613.00
01/23/2017	00036-Texas NAACP (Voter ID)	Call with (712) 775-7031	Gary Bledsoe 0.2	\$613.00
01/23/2017	00036-Texas NAACP (Voter ID)	Responded to email and provided suggestions for proposed email to DOJ on behalf of private plaintiffs in Veasey v. Abbott	Gary Bledsoe 0.1	\$613.00
02/21/2017	00036-Texas NAACP (Voter ID)	ACTIVITIES: Other: Conference Call	Gary Bledsoe 0.6	\$613.00
02/21/2017	00036-Texas NAACP (Voter ID)	ACTIVITIES: Plan and prepare for: Planned and prepared information to present to Client group	Gary Bledsoe 0.5	\$613.00
02/23/2017	00036-Texas	ACTIVITIES: Other: Texas Voter ID Conference Call	Gary Bledsoe	\$613.00

	NAACP (Voter ID)		0.5	
03/07/2017	00036-Texas NAACP (Voter ID)	Responded to emails regarding effect of SB5 brief, with editing suggestions	Gary Bledsoe 0.1	\$613.00
03/07/2017	00036-Texas NAACP (Voter ID)	ACTIVITIES: Draft/revise: Reviewing emails, drafts and making comments on drafting	Gary Bledsoe 1.80	\$613.00
03/10/2017	00036-Texas NAACP (Voter ID)	Call with (712) 775-7031	Gary Bledsoe 0.1	\$613.00
03/20/2017	00036-Texas NAACP (Voter ID)	Call with Ezra Rosenberg about case	Gary Bledsoe 0.2	\$613.00
03/20/2017	00036-Texas NAACP (Voter ID)	Sent an email detailing thoughts on matters for potential inclusion in the response. Including the law failing to define reasonable impediment	Gary Bledsoe 0.1	\$613.00
03/29/2017	00036-Texas NAACP (Voter ID)	Reviewed and responded to email re: Activity in Case 2:13-cv-00193 Veasey et al v. Abbott et al Advisory, to notify the court that SB5 passed the Senate	Gary Bledsoe 0.1	\$613.00
06/01/2017	00036-Texas NAACP (Voter ID)	Sent email regarding follow-up calls and about Jose seeking 3 (c) relief for redistricting.	Gary Bledsoe 0.1	\$613.00
06/03/2017	00036-Texas NAACP (Voter ID)	Responded to email question about proposed briefing schedule	Gary Bledsoe 0.1	\$613.00

06/22/2017	00036-Texas NAACP (Voter ID)	Responded to email question about planning a conference call as well as discussing needing to see if reasonable impediment affidavits were scrutinized by grand juries or criminal investigators.	Gary Bledsoe 0.1	\$613.00
07/01/2017	00036-Texas NAACP (Voter ID)	Conference Call (Gary, Myrna, Ezra)	Gary Bledsoe 1.0	\$613.00
07/17/2017	00036-Texas NAACP (Voter ID)	Call with (712) 775-7031	Gary Bledsoe 0.3	\$613.00
07/17/2017	00036-Texas NAACP (Voter ID)	Sent emails discussing Veasey v. Abbott and planning a time for a conference call to discuss.	Gary Bledsoe 0.1	\$613.00
08/24/2017	00036-Texas NAACP (Voter ID)	Call with (712) 775-7031	Gary Bledsoe 0.4	\$613.00
12/05/2017	00036-Texas NAACP (Voter ID)	TRAVEL EXPENSE: Travel to 5 th Cir. for argument hearing	Gary Bledsoe --	\$351.97

Total HOURS for Gary Bledsoe representing Texas NAACP: 75.6

Total EXPENSES due for Gary Bledsoe: \$568.97

Total due for Gary Bledsoe: HOURS @ \$613.00/hour: \$46,342.80

TOTAL: \$46,911.77